

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	11 Civ. 0691 (LAK)
	:	
STEVEN DONZIGER, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF CHEVRON CORPORATION'S
MOTION TO HOLD STEVEN DONZIGER IN CONTEMPT OF COURT FOR HIS
FAILURE TO COMPLY WITH THE COURT'S MARCH 5, 2019 ORDER**

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Attorneys for Plaintiff Chevron Corporation

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Chevron Corporation's ("Chevron") Motion to Hold Steven Donziger in Contempt of Court for His Failure to Comply with the Court's March 5, 2019 Order; the Declaration of Anne Champion, dated March 20, 2019; and all prior pleadings and proceedings in this matter, Chevron respectfully moves this Court for entry of an order holding Steven Donziger in civil contempt pursuant to Federal Rule of Civil Procedure 70(e) and Local Civil Rule 83.6 of the Local Rules of the United States District Court for the Southern District of New York, and imposing monetary sanctions that increase each day until Donziger is in full compliance, and if noncompliance continues, his arrest and imprisonment until such time as he fully complies with the March 5, 2019 Order. The Court may also consider ordering the seizure of Donziger's electronic devices and/or the surrender of his passport to remedy in part his noncompliance. Chevron further requests such other relief as the Court deems just and proper.

Dated: March 20, 2019
New York, New York

Respectfully submitted,
GIBSON, DUNN & CRUTCHER LLP

/s/ Randy M. Mastro

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